

EXHIBIT A

From: [ThucMinh Nguyen](#)
To: [John B. Campbell](#); [Allen Gardner](#)
Cc: [Casey L. Shomaker](#); [Clara Bourget](#); [Emily Tannenbaum](#); [Kenneth Scott](#); [Alan Block](#); [AA Intellectual Ventures](#); [Jonathan K. Waldrop](#); [John Downing](#); [Intellectual Ventures](#)
Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980
Date: Friday, May 23, 2025 9:43:32 PM
Attachments: [image001.png](#)
[image002.png](#)

John,

We are filing our forthcoming Opposed Motion for Leave to Amend the Complaint. There are confidential licensing information referenced in the Amended Complaint. Therefore, we will be filing a motion to seal. We assume that American is also opposed to this Motion to Seal and will indicate as such.

Many thanks,
Minh

From: ThucMinh Nguyen
Sent: Friday, May 23, 2025 4:45 PM
To: 'John B. Campbell' <jcampbell@McKoolSmith.com>; Allen Gardner <Allen@allengardnerlaw.com>
Cc: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Clara Bourget <cbourget@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>; AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>
Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

John,

Following up on the below. Please let us know American's position on IV's Motion for Leave to File an Amended Complaint. As previously indicated, we are readily available to meet and confer today. If we do not hear from you, we will assume that American opposes the Motion for Leave and will indicate as such in our forthcoming motion.

Regards,
Minh

From: John B. Campbell <jcampbell@McKoolSmith.com>
Sent: Friday, May 23, 2025 6:54 AM
To: ThucMinh Nguyen <TNguyen@kasowitz.com>; Allen Gardner <Allen@allengardnerlaw.com>
Cc: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Clara Bourget <cbourget@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>;

AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>

Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

Minh,

It is not appropriate to “assume” American’s position on an issue. See L.R. 7(h).

Of course, to have a “sincere effort in which the participants present the merits of their respective positions” in a meet and confer, L.R. 7(h), American needs a copy of the proposed amended complaint. It’s difficult to form a view on a proposed amended complaint without understanding the scope of the proposed amendment(s). American understands that IV is refusing to provide a copy of the proposed amended complaint unless American agrees not to use providing the proposed amended complaint as a basis for the declaratory judgment action. We will discuss IV’s request with our client and let you know if American agrees.

Thanks,
John

McKool Smith | John B. Campbell
Principal | Austin, TX | Tel: [\(512\) 692-8730](tel:(512)692-8730)

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From: ThucMinh Nguyen <TNguyen@kasowitz.com>

Sent: Thursday, May 22, 2025 5:31 PM

To: John B. Campbell <jbcampbell@McKoolSmith.com>; Allen Gardner <Allen@allengardnerlaw.com>

Cc: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Clara Bourget <cbourget@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>;

AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>

Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

John,

We attempted to reach you earlier by telephone to discuss our forthcoming motion for leave to amend the complaint but were unable to connect with you.

As previously indicated, the amended complaint will include additional patents, and we intend

to file our motion tomorrow. At this time, we are not in a position to provide a draft of the amended complaint absent an enforceable agreement that American and its affiliates will not seek a declaratory judgment.

Please return our call or let us know a convenient time to discuss. If we do not hear from you, we will assume that American opposes the motion and will indicate as such in our motion.

Regards,
Minh

From: John B. Campbell <jcampbell@McKoolSmith.com>
Sent: Thursday, May 22, 2025 5:25 AM
To: ThucMinh Nguyen <TNguyen@kasowitz.com>; Allen Gardner <Allen@allengardnerlaw.com>
Cc: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Clara Bourget <cbourget@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>; AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>
Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

Minh,

Thanks for following up a few hours after sending the original request. We appreciate IV generally identifying the high-level purpose for amending its complaint (to add patents) in this latest request. Please provide a draft of the proposed amended complaint along with a red-line for American's consideration. Once we've had a chance to review and discuss with our client, we will provide times to meet and confer.

Thanks,
John

McKool Smith

John B. Campbell
Principal
Austin, TX
Tel: (512) 692-8730
www.mckoolsmith.com

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From: ThucMinh Nguyen <TNguyen@kasowitz.com>
Sent: Wednesday, May 21, 2025 3:21 PM
To: Allen Gardner <Allen@allengardnerlaw.com>

Cc: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Clara Bourget <cbourget@McKoolSmith.com>; John B. Campbell <jcampbell@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>; AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>

Subject: Re: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

Counsel,

Following up on our meet and confer request below. IV intends to move for leave to add additional patents in the case against American by this Friday. We are happy to meet and confer with American to discuss, but we need to schedule the meet and confer. Otherwise we will assume American is opposed.

Many thanks,
Minh

On May 21, 2025, at 7:36 AM, Allen Gardner <Allen@allengardnerlaw.com> wrote:

Casey,

We'd like to confer regarding a motion for leave to file an amended complaint.
When are you folks available to confer regarding this matter?

Sincerely,

Allen F. Gardner
Allen Gardner Law, PLLC
609 S. Fannin
Tyler, Texas 75701
allen@allengardnerlaw.com
www.allengardnerlaw.com
Ph: 903-944-7537
F: 903-944-7856

Do Justice. Love Mercy. Walk Humbly.

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From: Casey L. Shomaker <cshomaker@McKoolSmith.com>
Sent: Friday, May 16, 2025 9:06 AM
To: ThucMinh Nguyen <TNguyen@kasowitz.com>
Cc: Clara Bourget <cbourget@McKoolSmith.com>; John B. Campbell <jcampbell@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>; AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>; Allen Gardner <Allen@allengardnerlaw.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>
Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

Hi Minh,

These look good. You may add my signature and file.

Thanks,

<image001.png> | <image002.png>

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From: ThucMinh Nguyen <TNguyen@kasowitz.com>
Sent: Thursday, May 15, 2025 7:26 PM
To: Casey L. Shomaker <cshomaker@McKoolSmith.com>
Cc: Clara Bourget <cbourget@McKoolSmith.com>; John B. Campbell <jcampbell@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>; AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>; Allen Gardner <Allen@allengardnerlaw.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John

Downing <JDowning@kasowitz.com>; Intellectual Ventures
<IntellectualVentures@kasowitz.com>

Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

Casey,

Attached is a draft of the motion for extension. Please let us know if you have edits and whether we have your consent to file.

Many thanks,
Minh

From: ThucMinh Nguyen <TNguyen@kasowitz.com>

Sent: Thursday, May 15, 2025 1:08 PM

To: Casey L. Shomaker <cshomaker@mckoolsmith.com>

Cc: Clara Bourget <cbourget@mckoolsmith.com>; John B. Campbell
<jcampbell@mckoolsmith.com>; Emily Tannenbaum
<etannenbaum@mckoolsmith.com>; Kenneth Scott <kscott@mckoolsmith.com>; Alan
Block <ABlock@mckoolsmith.com>; AA_Intellectual_Ventures
<AA_Intellectual_Ventures@mckoolsmith.com>; Allen Gardner
<Allen@allengardnerlaw.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John
Downing <JDowning@kasowitz.com>; Intellectual Ventures
<IntellectualVentures@kasowitz.com>

Subject: Re: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

Many thanks Casey.

We will send you a draft of the unopposed motion for extension shortly.

Best,
Minh

On May 15, 2025, at 1:06 PM, Casey L. Shomaker
<cshomaker@mckoolsmith.com> wrote:

Minh,

We agree to the below modifications.

Thanks,

McKool Smith | Casey L. Shomaker
Associate | Dallas, TX | Tel: [\(214\) 978-4218](tel:(214)978-4218)

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From: ThucMinh Nguyen <TNguyen@kasowitz.com>
Sent: Thursday, May 15, 2025 2:52 PM
To: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Clara Bourget <cbourget@McKoolSmith.com>; John B. Campbell <jcampbell@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>; AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>
Cc: Allen Gardner <Allen@allengardnerlaw.com>; Jonathan K. Waldrop <JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>; Intellectual Ventures <IntellectualVentures@kasowitz.com>
Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A. No. 4:24-cv-00980

Casey,

We propose the below changes to the scheduling order, with all other deadlines remaining unchanged. Please let us know whether American is agreeable and we will circulate a draft of the unopposed motion for extension.

Event	Current Date	Proposed New Date
Infringement Contentions	May 19, 2025	May 23, 2025
Invalidity Contentions	June 16, 2025	June 20, 2025

Many thanks,
Minh

From: Casey L. Shomaker <cshomaker@McKoolSmith.com>
Sent: Thursday, May 15, 2025 6:50 AM
To: ThucMinh Nguyen <TNguyen@kasowitz.com>; Clara Bourget <cbourget@McKoolSmith.com>; John B. Campbell

<jcampbell@McKoolSmith.com>; Emily Tannenbaum
<etannenbaum@McKoolSmith.com>; Kenneth Scott
<kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>;
AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>
Cc: Allen Gardner <Allen@allengardnerlaw.com>; Jonathan K. Waldrop
<JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>;
Intellectual Ventures <IntellectualVentures@kasowitz.com>
Subject: RE: Intellectual Ventures I LLC et al. v. American Airlines, Inc |
C.A. No. 4:24-cv-00980

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ADDRESS.**

Minh,

Because IV's requested extension will impact the claim construction deadlines, can you send over a proposal for how those deadlines should likewise be modified?

Thanks,

— I —

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From: ThucMinh Nguyen <TNguyen@kasowitz.com>
Sent: Wednesday, May 14, 2025 6:54 PM
To: Casey L. Shomaker <cshomaker@McKoolSmith.com>; Clara Bourget <cbourget@McKoolSmith.com>; John B. Campbell <jcampbell@McKoolSmith.com>; Emily Tannenbaum <etannenbaum@McKoolSmith.com>; Kenneth Scott <kscott@McKoolSmith.com>; Alan Block <ABlock@McKoolSmith.com>; AA_Intellectual_Ventures <AA_Intellectual_Ventures@mckoolsmith.com>
Cc: Allen Gardner <Allen@allengardnerlaw.com>; Jonathan K. Waldrop

<JWaldrop@kasowitz.com>; John Downing <JDowning@kasowitz.com>;
Intellectual Ventures <IntellectualVentures@kasowitz.com>

Subject: Intellectual Ventures I LLC et al. v. American Airlines, Inc | C.A.
No. 4:24-cv-00980

Counsel,

Please let us know whether American would agree to a short extension of the deadline for IV to serve infringement contentions from Monday, May 19 to Friday, May 23. IV would, of course, be amenable to a reciprocal extension of the deadline for American to serve invalidity contentions.

Many thanks,

Minh

ThucMinh Nguyen
Kasowitz Benson Torres LLP
333 Twin Dolphin Drive, Suite 200
Redwood Shores, CA 94065
Tel. (650) 453-5420
Fax. (650) 362-9302
TNguyen@kasowitz.com

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